

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 828-2265

E-Mail Address: PaperL@dsmo.com

December 7, 1998

CC 94-102

By Hand

ORIGINAL

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: KNLG656  
KNLG661  
KNLF897  
KNLG658  
KNLG660  
KNLG657  
KNLG662  
KNLG659

RECEIVED

DEC - 7 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

The purpose of this letter is to request that the Commission accept the attached request from Central Wireless Partnership ("CWP"), licensee of the above-referenced PCS licenses, for a waiver of Section 20.18(c) of the Commission rules concerning transmission of 911 calls made from TTY devices using digital wireless systems. Unfortunately, CWP did not determine that a waiver was necessary until Friday, December 4, 1998 and the request transmitted to counsel in Washington, D.C. was not received in time to file the waiver request with the Commission. Neither the public interest nor any private interest will be adversely affected by accepting CWP's waiver request one day after the deadline established by the Commission.

If the staff has any questions concerning the waiver request, the undersigned counsel should be contacted.

Sincerely,

Dickstein Shapiro Morin & Oshinsky, LLP  
Attorneys for Central Wireless Partnership

By:



Lewis J. Paper

Magalie Roman Salas, Secretary  
December 7, 1998  
Page 2

LJP/sbp

Enclosure

cc: Martin D. Liebman (by hand)  
David Nelson (by mail)

RECEIVED

DEC 7 - 1998

▪ Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Revision of the Commission's Rules )  
To Ensure Compatibility with ) CC Docket No. 94-102  
Enhanced 911 Emergency ) DA 98-2323  
Calling Systems )

**Central Wireless Partnership's Request for Waiver of Section 20.18(c) of the Commission's Rules**

At this time, Central Wireless Partnership is unable to comply with the requirement of Section 20.18(c), specifically the requirement that TTY users be able to access 911 over digital wireless phones. Therefore, as directed by the Commission in its *Order*<sup>1</sup>, Central Wireless Partnership is filing this petition to request a waiver of Section 20.18(c) of the Commission's rules and to demonstrate its commitment to, and plans for, complying with Section 20.18(c).

By way of background, on November 13, 1998, the Wireless Telecommunications Bureau released an *Order* extending through December 31, 1998, the suspension of enforcement of Section 20.18(c) of the Commission's Rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems.<sup>2</sup> In the same *Order*, the Commission also established procedures under which wireless carriers subject to the requirements of Section 20.18(c) may petition the Commission, not later than December 4, 1998, for waiver of the above requirement.<sup>3</sup> According to the Commission, any waiver granted will take effect on January 1, 1999, after the suspension of enforcement expires.<sup>4</sup> The Commission mandated that carriers filing petitions for waiver specify with sufficient particularity answers to three questions.<sup>5</sup> Below is Central Wireless Partnership's response to the questions posed by the Commission.

**What steps is Central Wireless Partnership taking or does it intend to take to provide users of TTY devices with the capability to operate such devices in conjunction with digital wireless phones?**

---

<sup>1</sup> Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, RM-8143 (rel. Nov. 13, 1998) ("*Order*").

<sup>2</sup> See *Order* at 4.

<sup>3</sup> *Id.* at 3-4.

<sup>4</sup> *Id.* at 2.

<sup>5</sup> *Id.* at 3-4.

Central Wireless Partnership uses CDMA technology for its network. Currently our network and handset vendors do not provide equipment that supports TTY devices.

**When does Central Wireless Partnership intend to make this capability available to TTY users?**

Central Wireless Partnership will support TTY devices as soon as our vendors provide the capability.

**What reasonable steps will Central Wireless Partnership take to address the consumer concerns referenced in the September 30<sup>th</sup> Order?**

Currently Central Wireless Partnership's network and handsets provide a caller with: 1) volume control; 2) vibrating ring singal indication; 3) call information, i.e., ANI

Central Wireless Partnership is aware of the obligation to make submissions every three months in order to maintain the waiver that is being requested. If after three months, Central Wireless Partnership is not able to meet the requirements of Section 20.18(c), Central Wireless Partnership will be seeking another waiver.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Nelson', with a long horizontal flourish extending to the right.

David S. Nelson  
Central Wireless Partnership